

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DELBRA L. DEAN,

Plaintiff,

v.

**1715 NORTHSIDE DRIVE, INC. et
al.,**

Defendants.

Civil Action No. 1:14-cv-3775-CAP

**JOINT MOTION FOR AN EXTENSION OF TIME TO FILE
RESPONSES TO MOTIONS FOR SUMMARY JUDGMENT**

Defendants 1715 Northside Drive, Inc., A-1 Entertainment, LLC and Carmen Popovitch and Plaintiff Delbra L. Dean, by and through the undersigned counsel, hereby submit this Joint Motion for an Extension of Time to File Responses to Motions for Summary Judgment, showing the Court as follows:

1. Pursuant to this Court's Order [Dkt. 47] of July 24, 2015, the discovery period in this action ended on September 28, 2015.
2. On October 27, 2015, Defendant filed a Motion for Summary Judgment [Dkt. 77]. Plaintiff's response is due November 17, 2015 pursuant to LR 7.1(B) NDGa.

3. On November 4, 2015, Plaintiff filed a Motion for Partial Summary Judgment [Dkt. 92] in excess of the 25 page limit; 39 pages. Defendant's response is due November 25, 2015 pursuant LR 7.1(B) NDGa.
4. Over the next few weeks, in addition to the response deadline for the motions for summary judgment in this case, Plaintiff's counsel has (1) a specially set bench trial in *Martin v. Jobo's, Inc. et al.*, Civil Action No. 1:13-cv-4242-RWS; and (2) a motion for summary judgment deadline in *Drews v. Jobo's, Inc. et al.*, Civil Action No. 1:14-cv-3774-ODE, in addition to both parties having various deadlines for smaller pleadings and discovery matters.
5. Due the unusual high concentration of Plaintiff's counsel's major motion deadlines and both Parties' counsel's trial schedules, the Parties jointly request that the deadlines for filing responses to the Motions for Summary Judgment be extended as follows:
 - a. Plaintiff's response deadline be extended for 6 days, through and including November 23, 2015; and
 - b. Defendant's response deadline be extended for 14 days, through and including December 9, 2015.
6. This request is made in good faith and not for the purpose of undue delay.

7. A proposed Consent Order is contemporaneously filed herewith.

WHEREFORE, the Parties pray that this Joint Motion for an Extension of Time to file Responses to Motions for Summary Judgment be granted.

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), the undersigned counsel for Defendants certifies that this pleading has been prepared in Times New Roman, 14-point type, which is one of the font and point selections approved by the Court in Local Rule 5.1(B).

This 15th day of November 2015.

/s/ Matthew W. Herrington*

Matthew W. Herrington

Georgia Bar No. 275411

*with express permission

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day he electronically filed the foregoing document with the Clerk of Court using the CM/ECF System which will automatically send e-mail notification of such filing to all attorneys of record.

Dated: November 15, 2015.

/s/ Andrei Ciobanu

Andrei Ciobanu

Michigan Bar No. P70726

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[PROPOSED] CONSENT ORDER

This matter is before the Court on the Parties' Joint Motion for an Extension of Time to File Response Motions to the filed Motions for Summary Judgment. Having reviewed the Motion, and for good cause shown, it is hereby ORDERED that: (1) Plaintiff shall have through and including November 23, 2015; and (2) Defendant shall have through and including December 9, 2015, within which to file their respective responses to motions for summary judgment.

SO ORDERED, this _____ day of _____ 2015.

HONORABLE CHARLES A. PANNELL, JR.
SENIOR JUDGE, U.S. DISTRICT COURT